

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
GEORGE MARINOS,

Plaintiff,

Index No.:

-against-

**VERIFIED COMPLAINT**

JOHN ZAHARATOS,

Defendant.  
-----X

TO THE SUPREME COURT OF THE STATE OF NEW YORK:

I, Plaintiff GEORGE MARINOS, representing myself, as and for my Verified  
Complaint, allege as follows:

**NATURE OF THE ACTION**

1. This is an action, pursuant to CPLR 214-G, seeking relief owed me,  
Plaintiff GEORGE MARINOS, arising out of the tortious conduct against me of my  
stepfather Defendant JOHN ZAHARATOS ("Defendant") in sexually abusing me as a  
child under the age of eighteen.

**PARTIES**

2. I am an individual, residing at 256 Battery Avenue, Brooklyn, New  
York, 11209.

3. Defendant is an individual, residing at 416 Senator Street – First Floor,  
Brooklyn, New York 11220.

**JURISDICTION AND VENUE**

4. This court has jurisdiction over Defendant because Defendant committed  
the relevant tortious actions against me within the State of New York.

5. The basis of the venue designated is my place of residence, which is 256 Battery Avenue, Brooklyn, New York 11209.

**FACTUAL BACKGROUND**

6. I was born in Greece on May 31, 1977. My parents are MARINA MARINO, nee MICHALOVITS ("Mother") and JOHN MARINOS ("Father"), both citizens and residents of Greece at the time. I have an older sister by my parents, KATERINA MARINO ("Katerina"), born in Greece on June 3, 1976. My sister Katerina and I were raised in Greece until immigrating as children to the United States. My parents were divorced in 1984. Thereafter, my Mother had custody of us as children. At all relevant times, my Father resided in Greece, and I did not live with him.

7. My Mother married the Defendant, a Greek immigrant and naturalized US citizen, on May 5, 1989 in New York. On June 20, 1989, my Mother gave birth in New York to twins PANAGIOTIS ZAHARATOS and DIMITRA ANNA ZAHARATOS, fathered by the Defendant.

8. On or about August 1989, I came to New York to live temporarily with my step-aunt ELENI LAMBRAKIS, sister of the Defendant, while my Mother was in Greece with the newborn twins. At all relevant times, from December 1989 onwards, I resided permanently with my Mother and stepfather Defendant in the family residence at 7011 17<sup>th</sup> Avenue, Brooklyn, New York. My sister Katerina remained in Greece until after the birth of JOHN ZAHARATOS, JR. on August 15, 1991, the third child my Mother had with the Defendant, whereupon shortly thereafter she came to New York to reside permanently with us.

9. From age twelve to fourteen, on or about December 1989 to on or about

mid-August 1991, I was the only child, apart from the infant twins, living in the family home with my Mother and the Defendant. The sexual abuse occurred during this time period in the family residence at 7011 17<sup>th</sup> Avenue, Brooklyn, New York.

### **CAUSES OF ACTION**

10. From age twelve to fourteen, on or about December 1989 to on or about mid-August 1991, I was repeatedly sexually abused on numerous occasions by the Defendant.

### **CHILD VICTIM UNDER THE AGE OF EIGHTEEN**

11. At all relevant times, from on or about December 1989 to on or about mid-August 1991, when the Defendant sexually abused me, I was twelve to fourteen years old inclusive, having been born on May 31, 1977.

12. As such, I was under the age of consent as a matter of law.

### **THE DEFENDANT'S ACTS WERE SEXUAL**

13. The Defendant's acts directed towards me were sexual in nature.

14. The Defendant engaged in non-contact sexual acts towards me, including, but not limited to, voyeurism, examining me naked and other intimidating and threatening intrusions of my physical privacy, lewdness, obscene talking and gesturing, psychological manipulation and grooming.

15. When I came to reside at 7011 17<sup>th</sup> Avenue, Brooklyn on or about December 1989, the Defendant forbade me to use the main bathroom on the ground floor of the house, used by my Mother and himself. Instead, he required me exclusively to use the basement bathroom, which was unheated and in a remote part of the basement, far out of sight and earshot of my Mother's comings and goings above.

16. While I was showering, the Defendant would burst into the bathroom

unexpectedly. He claimed that now as my “father” he had to check on me as I entered the age of puberty, in particular, to examine the tumescence of my penis to determine whether I was masturbating, and to teach proper genital hygiene, so I should not be alarmed or consider it to be other than diligent care for a son. This took place on a regular basis, though unpredictably. I lived in constant dread of these unforeseeable intrusions and naked examinations of me, to the point where I avoided showering as much as possible.

**THE DEFENDANT’S SEXUAL ACTS WERE ABUSIVE**

17. The Defendant’s sexual acts constitute child abuse as a matter of law as I was a child victim under the age of eighteen.

18. I suffered deep and lasting levels of traumatic stress, anxiety, and depression and other psychological harm, at the hands of the Defendant as a result of the improper conduct inflicted upon me.

**THE DEFENDANT’S SEXUAL ABUSE WAS UNCONSCIONABLE**

19. The Defendant’s victimization of me was unconscionable. As my stepfather, he occupied a position of trust, authority, and responsibility over me, whose violation provided the context whereby he was able wrongfully to exploit my vulnerability.

20. The Defendant’s improper conduct occurred within a relationship of power. A dynamic of domination distinguished and defined the conduct inflicted upon me by the Defendant. The improper conduct occurred within a relation of domination and submission that involved closeness and dependence between dominating adult Defendant and myself as child victim of domination, based upon difference in age, in psychological and cognitive development, and in social role and status within the

family.

21. The Defendant's improper conduct was based on a position of inequality between superior and inferior. As victim stepchild, I was at a fundamental disadvantage in respect of age and physical, psychological, and cognitive capacity in relation to my stepfather.

22. The Defendant took advantage of his superior position as stepfather for his own benefit and to my detriment. The exploitation of my vulnerability as stepchild inflicted traumata upon me associated with degradation, humiliation, and loss of self-esteem.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff demands judgment as follows:

On Plaintiff's Causes of Action, damages compensatory, remedial, and punitive, together with such other and further relief as to which Plaintiff is entitled, including attorneys' fees, costs and disbursements, and such other relief as the Court may deem just and proper.

Dated: November 27, 2019  
Brooklyn, New York

  
\_\_\_\_\_  
GEORGE MARINOS, Plaintiff

To:  
John Zaharatos  
416 Senator St.  
First Floor  
Brooklyn, New York 1120

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS\_\_\_\_\_  
GEORGE MARINOS,

Plaintiff,

Index No. \_\_\_\_\_

-against-

**VERIFICATION**

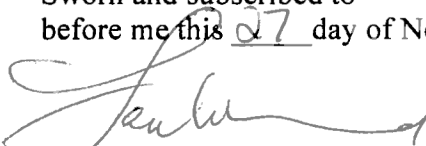
JOHN ZAHARATOS,

Defendant.  
\_\_\_\_\_STATE OF NEW YORK       )  
  ) ss.:  
COUNTY OF KINGS       )

GEORGE MARINOS, being duly sworn, states that he is the plaintiff in this action, that he has read the foregoing Verified Complaint and knows its contents, and that the foregoing Verified Complaint is true to his own knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters, he believes it to be true.

  
\_\_\_\_\_  
GEORGE MARINOS  
Plaintiff

Sworn and subscribed to  
before me this 27 day of November 2019

  
\_\_\_\_\_  
NOTARY PUBLIC (seal)